## **U.S. Department of Justice**



United States Attorney Eastern District of New York

GK/KCB/DEL/SMF F. #2028R01401

271 Cadman Plaza East Brooklyn, New York 11201

September 16, 2024

## By ECF & E-mail

Jennifer Ann Bonjean Bonjean Law Group, PLLC 303 Van Brunt Street, 1st Floor Brooklyn, NY 11231 718-875-1850 jennifer@bonjeanlaw.com Counsel for Nicole Daedone

Imran H. Ansari, Esq. Michael T. Jaccarino, Esq. Arthur L. Aidala, Esq. Aidala, Bertuna & Kamins PC 546 Fifth Avenue, Sixth Floor New York, New York 10036 (212) 486-0011 iansari@aidalalaw.com Counsel for Rachel Cherwitz

> United States v. Cherwitz et al. Re: Criminal Docket No. 23-146 (DG)

## Dear Counsel:

The government hereby provides notice pursuant to Fed. R. Crim. P. 16(a)(1)(G) and Fed. R. Evid. 702, 703 and 705 that, at trial, it anticipates calling Dr. Chitra Raghavan, a licensed clinical psychologist, to testify regarding methods of "coercive control" within various organizations. The government hereby provides additional materials related to the expected testimony of Dr. Raghavan in the enclosed disclosure, which is appended to this letter. The government reserves the right to supplement this disclosure with additional information.

The government also reserves the right to call additional and/or substitute expert witnesses. The government will comply with Federal Rule of Criminal Procedure 16(a)(1)(G) and Federal Rules of Evidence 702, 703 and 705, and notify you in a timely fashion of any additional or substitute experts that the government intends to call at trial and provide you with a summary of the experts' opinions.

Respectfully submitted,

**BREON PEACE** United States Attorney

By:  $/_{\rm S}/$ 

Gillian Kassner Kayla Bensing Devon Lash Sean M. Fern

Assistant U.S. Attorneys

(718) 254-7000